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9 Attorneys for the United States

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA, } No CR 05-00447-81 *ChB*
15 Plaintiff, } STIPULATION AND [PROPOSED]
16 v. } PROTECTIVE ORDER REGARDING
17 MISUK MOORE, } DISCOVERY
18 MIN SUNG KIM, }
19 aka Jum Rye Choi, }
aka Jum Rye Kim, }
20 WON GYU LIM, and, }
SANG HUN PARK, }
aka Steve, }
21 Defendants }
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24 The United States, through its counsel of record, and the defendants, through their counsel of
25 record, hereby agree and stipulate that the government will provide discovery on the following
26 conditions:

27 1. Protected Material

28 The discovery produced in this matter is deemed Protected Material. Possession of

1 copies of the Protected Material is limited to the defendants, their attorneys of record, and
2 investigators, paralegals, law clerks, translators, interpreters, experts and assistants for the
3 attorneys of record (hereinafter collectively referred to as "members of the defense team").

4 The defendants, their attorneys of record, and members of the defense team acknowledge
5 that providing copies of the Protected Material to other persons is prohibited, and agree not to
6 duplicate or provide copies of the Protected Material to other persons. The defendants, their
7 attorneys of record, and members of the defense team may show Protected Material to witnesses
8 or prospective witnesses in conjunction with their defense of the defendants in this case. The
9 defendants, their attorneys of record, and members of the defense team further acknowledge that
10 they are prohibited from using the Protected Material for any purpose other than defending the
11 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a
12 violation of the Protective Order. Further, the attorneys of record agree that prior to
13 disseminating any copies of the Protected Material to members of the defense team, they will
14 provide a copy of this Protective Order to members of the defense team.

15 Notwithstanding efforts taken by the government to redact personal information of
16 witnesses from the discovery provided to the defense (such as date of birth, social security
17 numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the
18 defense team agree that, should any such information be found during their review of this
19 material, they will not provide that personal information in any form – whether in verbal, written
20 or electronic format – to any third party, for any reason whatsoever.

21 2 Nontermination

22 The provisions of this Order shall not terminate at the conclusion of this prosecution but
23 only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants'
24 attorneys of record shall return all copies of any Protected Material (including all copies provided
25 to the defendants, their attorneys of record, and members of the defense team) to the United
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States Attorney's Office for the Northern District of California.

SO STIPULATED.

DATED: 8/3/05

8/3/05

RETER B. AXELROD
Assistant United States Attorney

ANDREW KLINE
J. EVANS RICE III
Trial Attorneys, U.S. Department of Justice

DATED:

MICHAEL STEPANIAN
Counsel for Defendant MiSuk Moore

DATED:

MARK GOLDROSEN
Counsel for Defendant Min Sung Kim

DATED:

HUGH A. LEVINE
Counsel for Defendant Won Gyu Lim

DATED:

MICHAEL GAINES
Counsel for Defendant Sang Hun Park

1 States Attorney's Office for the Northern District of California.
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3

4 SO STIPULATED.
5
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7 DATED:
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9 PETER B AXELROD
10 Assistant United States Attorney
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13 ANDREW KLINE
14 J. EVANS RICE III
15 Trial Attorneys, U.S. Department of Justice
16
17

18 DATED: 7/28/05

19 *Handy see below for Michael Stepanian*
20 MICHAEL STEPANIAN
21 Counsel for Defendant MiSuk Moore
22
23

24 DATED:
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26 MARK GOLDROSEN
27 Counsel for Defendant Min Sung Kim
28

29 DATED:
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31 HUGH A. LEVINE
32 Counsel for Defendant Won Gyu Lim
33

34 DATED:
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36 MICHAEL GAINES
37 Counsel for Defendant Sang Hun Park
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39 PROTECTIVE ORDER
40 [CR 05-00447 SI]

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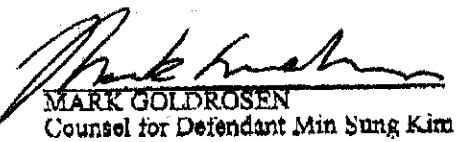
States Attorney's Office for the Northern District of California.

1 SO STIPULATED.
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PETER B. AXELROD
Assistant United States Attorney

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J. EVANS RICE III
Trial Attorneys, U.S. Department of Justice

MICHAEL STEPANIAN
Counsel for Defendant MiSuk Moore


MARK GOLDROSEN
Counsel for Defendant Min Sung Kim

HUGH A. LEVINE
Counsel for Defendant Won Gyu Lim

MICHAEL GAINES
Counsel for Defendant Sang Hun Park

1 States Attorney's Office for the Northern District of California.
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DATED:

PETER B. AXELROD
Assistant United States Attorney

ANDREW KLINE
J. EVANS RICE, III
Trial Attorneys, U.S. Department of Justice

DATED:

MICHAEL STEPANIAN
Counsel for Defendant MiSuk Moore

DATED:

MARK GOLDROSEN
Counsel for Defendant Min Sung Kim

DATED: 7-28-05

Hugh A. Levine
HUGH A. LEVINE
Counsel for Defendant Won Gyu Lim

DATED:

MICHAEL GAINES
Counsel for Defendant Sang Hun Park

PROTECTIVE ORDER
[CR 05 00447 SJ]

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1 States Attorney's Office for the Northern District of California.
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3 SO STIPULATED.
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DATED: PETER B. AXELROD
Assistant United States Attorney

ANDREW KLINE
J. EVANS RICE III
Trial Attorneys, U.S. Department of Justice

DATED: MICHAEL STEPANIAN
Counsel for Defendant MiSuk Moore

DATED: MARK GOLDROSEN
Counsel for Defendant Min Sung Kim

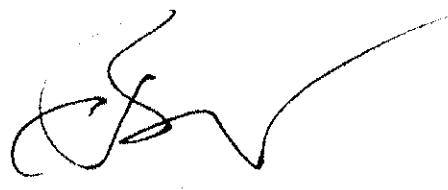
DATED: HUGH A. LEVINE
Counsel for Defendant Won Gyu Lim

DATED: 8/1/05
MICHAEL CAINUS
Counsel for Defendant Sang Hun Park

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ORDER
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IT IS SO ORDERED.

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DATED: Aug 3, 2005


SUSAN ILLSTON
United States District Judge 